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MARINE CORPS BASE QUANTICO BULLETIN 5500

From: Commander

To: Distribution List

Subj: 2016 ANNUAL ETHICS TRAINING AND CALENDAR YEAR 2016 CONFIDENTIAL SUPERVISOR REVIEW REQUIREMENTS FINANCIAL DISCLOSURE REPORT (OGE 450) ELECTRONIC FILING AND

Ref: (a) 5 CFR §§ 2634.901 to 909

(b) DoD 5500.07-R, Joint Ethics Regulation, Chapter 7, Section 3

(c) DEPSECDEF Memo of 19 Jul 16

(c) 5 CFR § 2638.705 (d) 18 U.S.C. § 208

5 CFR § 2635.502

Encl: (1) Office of Government Ethics Worksheet, "Determining Which Positions should File Confidential Financial Disclosure Report," September 2016

- FDM Quick Resource Guide "Filing an OGE 450"
- FDM Quick Resource Guide "Key Features Filers"
- Tracking Spreadsheet Sample OGE 450 Filer's Report Filing and Annual Ethics Training Completion

Marines by identifying and preventing potential criminal conflicts of interest or the appearance receive Standards of Conduct/Government Ethics support from the Quantico Area Counsel and substantial effect on the financial interests of non-Federal entities. The OGE Form 450 is process focuses on individuals in key positions with duties or responsibilities that have a direct of a lack of impartiality in the performance of official duties. disclosure system preserves the public's trust in the integrity of Government employees and system for electronic filing and management of financial disclosure reports. The financial Government owned and operated, secure web-based program, and is the DoD-wide enterprise Disclosure Management (FDM) system, located on-line at http://www.fdm.army.mil/. FDM is a Disclosure Report filers must file these reports electronically using the U.S. Army Financial Office (QACO). Effective January 1, 2017, all OGE Form 450 Confidential Financial completion of the 2016 annual ethics training requirements for Marine Corps activities who the Calendar Year 2016 (CY16) Confidential Financial Disclosure Report (OGE Form 450) and Situation. This Bulletin establishes procedures and guidelines for electronic submission of The financial disclosure reporting

the standardized report used by required filers in the Executive Branch of the Federal

file an OGE Form 450 covering CY16 and receive required annual ethics training. Mission. As required by references (a) and (b), certain military and civilian personnel must

5. Execution

a. Commander's Intent and Concept of Operations

- must attend a live ethics training session. every three years; this means that filers who did not receive live ethics training in 2015 and 2014 who require live training in 2016. All annual OGE 450 filers must receive live training once November and December 2016 for all New Entrant OGE Form 450 filers, and all annual filers Operational Test and Evaluation Activity (MCOTEA); and (8) Joint Non-Lethal Weapons Directorate (JNLWD). Additionally, QACO will provide live annual ethics training sessions in Fund Audit Service (MCNAFAS); (5) Marine Corps Air Facility (MCAF); (6) Marine Corps MCBQ); (3) Marine Corps Intelligence Activity (MCIA); (4) Marine Corps Non-Appropriated Marine Corps Installations National Capital Region - Marine Corps Base Quantico (MCINCRorganizations, to include Capabilities Development Directorate (CDD), Operations Analysis activities: (1) Marine Corps Combat Development Command (MCCDC) and its subordinate OGE Form 450 Confidential Financial Disclosure reports for the following commands and Division (OAD), Futures Division, and Marine Corps Warfighting Laboratory (MCWL); (1) Commander's Intent. QACO will provide ethics counselor review and certification of
- available from the attached references; from the FDM website: reports, and to assist supervisors with questions about the review of the submitted reports. Additional resources and information for OGE Form 450 report filers and supervisors is available to answer questions from report filers about preparing and filing their OGE Form 450 from QACO live annual ethics training sessions within their command spaces. QACO is also filer's chain of command. Supported commands and activities may also request and schedule submit their reports to another Counsel office or to an SJA office, as approved by the report live training. QACO will also make this training available to OGE Form 450 report filers who all required information. QACO will provide live annual ethics training in November and certification of the OGE Form 450 reports online, ensuring the reports are accurate and contain official duties and financial interests. QACO will complete the ethics counselor review and supervisors will review the reports to ensure there are no conflicts of interest with the filer's (https://www.fdm.army.mil). OGE Form 450 filers will submit their reports online, and (2) <u>Concept of Operations</u>. QACO will work with supported commands and activities to create and organize OGE Form 450 filer databases online using the FDM website. December 2016 to OGE 450 report filers from supported commands and activities that require

Ethics website at: https://www.fdm.army.mil/helpSupport/helpSupport.htm; and from the Office of Government

https://www.oge.gov/Web/oge.nsf/Resources/Helpful+Resources+for+Confidential+Financial+

b. Subordinate Element Missions

- eric.rodriguez@usmc.mil, or by phone at: (703) 784-3009, by no later than Monday, 5 and to the QACO Point of Contact, Mr. Eric Rodriguez, via e-mail at: project and forward the name and contact information of their AO to their division supervisors (1) Unit Commanders and Division Directors will appoint an Action Officer (AO) for this
- (2) <u>Supervisors</u> of all OGE Form 450 filers will:
- their requirement to file the Confidential Financial Disclosure Report; (a) Notify all identified subordinate employees (see enclosure (1) "Who must file"), of
- (b) Forward a list of all identified OGE Form 450 filers to their AO;
- supervisors will have time to review the reports and request clarification if necessary. OGE 2017, unless OACO has granted the filer a filing deadline extension; Form 450 reports cover calendar year 2016, and may not be submitted or dated before 31 December 2016. (c) Encourage report filers to promptly submit their OGE Form 450 report so that OGE Form 450 reports must be signed by filer no later than 15 February
- and the filer's reported outside employment/activities; reported financial interests; the financial interests of the filer's spouse and/or dependent children no actual or apparent conflicts of interest between the filer's official duties and the filer's (https://www.fdm.army.mil) to determine that each report section is completed and that there are (d) Review their subordinates' OGE Form 450 reports online via the FDM website
- reports on FDM; and (e) Upon completion of the review, electronically sign and date the OGE Form 450
- and upon good cause shown, a grant up to another 45 days for a second filing extension, for a complete the report, if they request the extension before the filing deadline. A QACO Ethics Counselor (EC) may grant a filing extension to a filer for up to 45 days for the first extension; response. Note that report filers may request from their supervisors an extension of time to to the QACO POC (Mr. Rodriguez) any administrative or disciplinary measures taken in disciplinary measures. For any filers that fail to file their report within the filing deadline, report deliberately provide or omit required information, may be subject to administrative or with the references, employees who fail to submit their OGE Form 450 report on time, or who (f) Investigate the circumstances surrounding any required OGE Form 450 subordinate employee's failure to file a complete report by 15 February 2017. In accordance total extension of up to 90 days.
- (3) Action Officers will:

- (a) Act as the liaison between the supported command/activity and the QACO POC;
- information provided in the sample report tracking spreadsheet (Enclosure 4); (b) Prepare a Microsoft Excel spreadsheet listing their OGE 450 Filers and include all
- command/activity, submit a copy of the annual ethics training worksheet to the QACO POC, Mr. using the information provided in Enclosure (4), to include date of training completion and method of training (live or via internet/TWMS). Annual ethics training must be completed no Eric Rodriguez; later than December 31, 2016. Upon completion of annual ethics training for their (c) Record annual ethics training completion of their OGE Form 450 report filers
- reports/reviews as required; and reviews online via FDM; providing reminders to filers and supervisors to complete (d) Track the progress of their OGE Form 450 filers' report submission and supervisor
- no later than 60 days after the report filing deadline of Wednesday, 15 February 2017. POC, Mr. Eric Rodriguez, by e-mail (eric.rodriguez@usmc.mil) or by fax at: (703) 784-5128, (e) Submit upon completion the OGE Form 450 report filing spreadsheet to the QACO

(4) <u>QACO</u> will:

- (a) Provide in person 2016 Annual Ethics Training Briefs;
- additional information is required from the report filer, QACO will directly contact the filer/or return the electronic report back to filer for correction; (b) Conduct the Ethics Counsel review and final certification of the report.
- extension; and (c) Review, and if warranted, grant requests from report filers for a filing deadline
- AOs and record final certification of reports (d) Compile and update OGE Form 450 report tracking spreadsheets received from

4. Administration and Logistics

- duties of the position require filing this report. Marine/employee's immediate supervisor has primary responsibility for determining whether the Enclosure (1) provides guidance concerning who must file an OGE Form 450.
- b. All OGE Form 450 filers must complete annual ethics training either on-line via TWMS or attend ethics training provided by the QACO no later than Friday, 30 December 2016.

- schedule in-person annual ethics training for their OGE 450 filers at their command spaces 1530. Additionally, AO's are encouraged to contact the QACO POC, Mr. Eric Rodriguez, to Research Center. Two sessions will be offered; the first from 1300-1400, and the second 1430-QACO will provide live, in-person annual ethics training on 5, 6, and 7 Dec 2016 at Grey
- 2016 The OGE Form 450 report covers the period from 1 January 2016 through 31 December
- reports is encrypted. The report is protected under the Privacy Act, and is not subject to release purposes as stated in references (a) and (b). to the public under the Freedom of Information Act (FOIA). The report may only be used for the Defense Common Access Card (CAC), and the information contained in financial disclosure website; access to the FDM website is only available to authorized users via a Department of The FDM electronic report filing system safeguard's its user's privacy. FDM is a secure

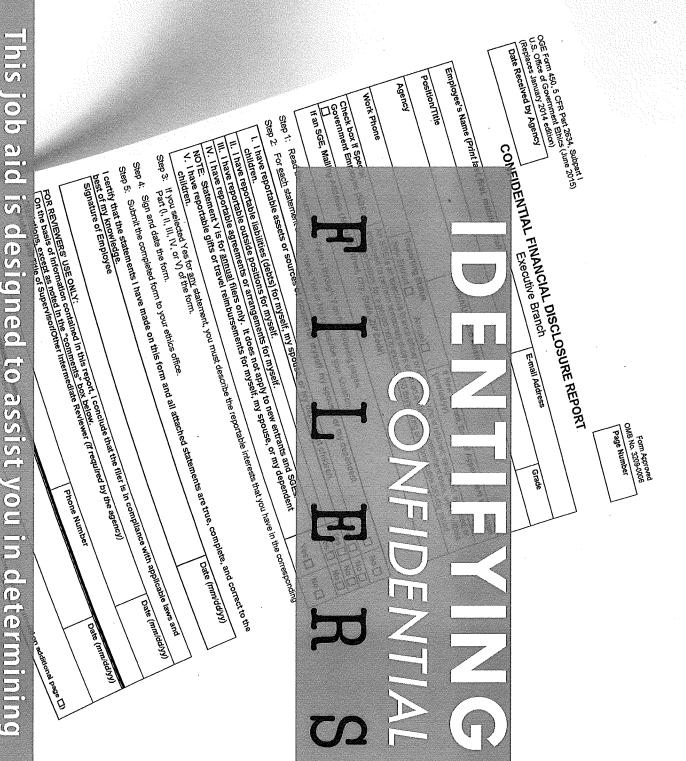
5. Command and Signal

completing their ethics training. for instructions on how to comply with financial disclosure reporting requirements and National Geospatial-Intelligence Agency (NGIA), and the Naval Criminal Investigative Service Systems Command (MCSC), Marine Corps Tactical System Support Activity East (MCTSSA), Manpower and Reserve Affairs (M&RA), Wounded Warrior Regiment (WWR), Marine Corps Fourth Light Armored Reconnaissance Battalion, Marine Corps Recruiting Command (MCRC), (NCIS). These activities should coordinate with their Counsel or Staff Judge Advocate Marine Helicopter Squadron One (HMX-1), Marine Corps Embassy Security Group (MCESG), Command. This Bulletin does not apply to the following tenant activities: FBI Academy

b. Signal. This Bulletin is effective the date signed.

OUCHER

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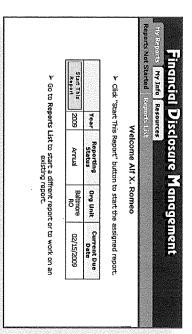
Determining Which Positions Should File A Confidential Financial Disclosure Report: A Worksheet

This job aid is designed to assist ethics officials in determining whether a <u>career</u> employee should file a Confidential Financial Disclosure Report (OGE Form 450). Some Special Government Employees and Schedule C employees may also be required to file confidential financial disclosure reports. If you have questions about the criteria listed below, contact your agency's Ethics Office.

□ investigating or prosecuting violations of criminal or civil law; □ representing the United States in litigation or other proceedings; □ scientific or social science research, when the research will have a direct and substantial effect on the financial interests of non-federal entities.	3. Is the employee serving in any other position where there is a potential for conflict of interest, appearance of favoritism or loss of impartiality? Examples include:	performing other activities, when those activities will have a direct and substantial effect on the financial interests of non-federal entities. *Non-federal entities include, for example, businesses, non-profit organizations, and state and local governments.	 administering, awarding, monitoring, or making determinations regarding grants, subsidies, licenses, or other federal benefits; regulating, auditing, or inspecting non-federal entities*; 	☐ contracting or procurements above the micro-purchase threshold; Example: A GS-7 Office Automation Clerk is issued a purchase card to buy office supplies for her work unit as needed. Such an employee is generally excluded from filing.	10000	Type of Work Done By the Employee	Basic pay does not include locality payments, bonuses, etc. For reemployed annuitants, the rate of basic pay is the employee's basic pay	OR ☐ If the employee is not paid on the GS scale, is the employee's rate of basic pay less than 120% of the minimum rate of basic pay for the GS-15 level?	1. Is the employee's position classified at or below the GS-15 level?	I. Pay
Go to question 4.	□Yes	·		Go to question 4.	□ Yes			Go to question 2.	□ Yes	
If you said "no" to questions 2 and 3, the employee does not need to file.	□ No			Go to question 3.	□ No		if this employee must file a public financial disclosure form.	STOP Your agency's Ethics Office will determine	O No	

FILING AZ OGE 450 REPORT





This guide covers the basic steps for filing, viewing and amending an OGE 450 report in FDM.

Adding an OGE 450 Report

- 1. To create a new OGE 450 report, go to either:
- The Reports Not Started tab, if you have been assigned a specific report to file in FDM and click Start This Report.

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 the Reports List tab, if you need to create a different report than the one assigned and click Add New Report.

Getting Started

Review the information on the page and then click Continue.

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Special Government Employee

Select if you are or are not a Special Government Employee and click Continue.

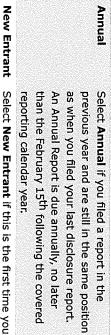
Reporting Status

4. Select the appropriate Report Status and click Continue.

The following screens vary depending upon the Reporting Status you selected.

- Annual filers select the year covered by this report.
- New Entrant filers enter your appointment date and your notified to file date.

The OGE 450 has two different reporting statuses:



t Select New Entrant if this is the first time you are filing a disclosure report. The new Entrant report must be filed within 30 days of assuming a new position.

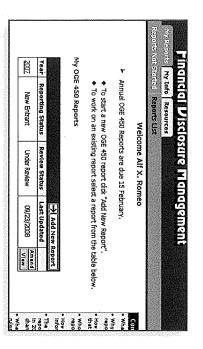
Common Questions

Common Questions contain relevant financial disclosure reporting questions and answers.

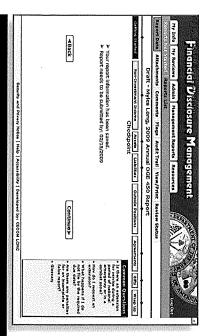
Checkpoint

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If you do not have any existing reports in FDM, the Checkpoint page displays a reminder message regarding the date this report is due. Review the information on the screen and then click **Continue.**



Gasurity and Privacy Robes Help Accessibility Developed by: CCCOM LCMC	- Continue≯	what is the reporting statut for this report? What is the reporting statut for this report? Annual " from heave flad an OGE estimate Statut for the product statut for the statut for the statut flad an OGE estimate Statut flad and Statut flad and OGE estimate Statut flad and OGE estim	reporting status	hilinae - Curaida Egebong - Egraemante	Report Data Attachments Comments Flory Audit Trail Niew/Print Review Status	Financial Disclosure Management Printo in Review Latin Supercust Reports Report Life Financial Reports Life Financial Repo
		an annual filer or a new entrant? Olossary	Common Questions	dies Wessup		Injidut



Contact Information

If this is the first time you are filing a report in FDM, the Contact Information page is displayed which contains information regarding your name, address, telephone number, position/title, e-mail address, etc. All fields must be filled in before you can continue.

Pre-Populate Report

Financial Disclosure Management

Reports List

FDM simplifies the maintenance of financial disclosure reports by allowing you to carry over any previously entered financial disclosure reporting information when creating new reports.

Note: You can only pre-populate from reports created after 12/21/2006. Any reports created before this date, will not be available to be selected for pre-population.

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SHIP SH

© Pre-populate my report with the report I have selected below - this option allows you to use the data from a previous report as a starting point for the new one. New Wrously all filers should use this option and choose their most report.

O Don't pre-populate my report - use this option to start a new report.

2007 New Entrant - Under Review

- Select an existing report to pre-populate this report or select Don't Pre-populate My Report and click Continue.
- Review the Due Date, Contact Information pages and click Continue. The Report has a draft Review Status.

Note: "No" does not pre-populate from the previous report.

Report Data

Information in the Report Data sections relate to the Filer, spouse and dependent children. You must click through all sections of the OGE 450 being sure to select **No** even if you do not have any information to disclose for that section.

The process for entering report data is the same no matter what type of information you need to report.

- 8. Select Yes and then click Continue.
- Type the appropriate non-investment income information and click Save.
- 10. Click Continue to move to the next Report Data section.

The following Report Data sections are included in an OGE 450 financial disclosure report.

- Non-Investment Income
- ASS
- Liabilities
- Outside Positions
- Agreements
- Gifts

Financial Disclosure Management

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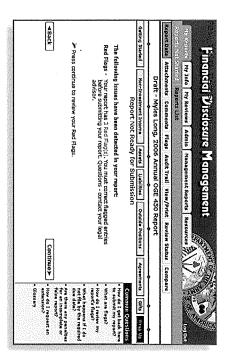
Report Not Started Reports Let

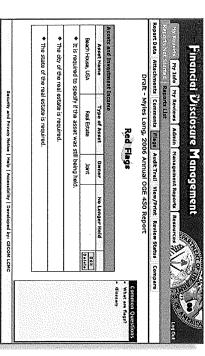
Report Data: Attachments Comments | Flags | Audit Trail | View/Print | Review Status | Compare

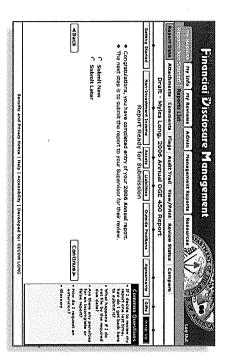
Draft - Alf X. Romeo, 2008 Annual OGE 450 Report

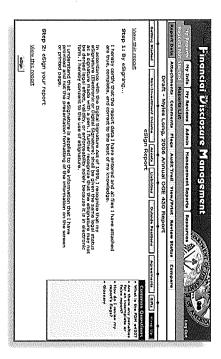
Getting Started | Non-Investment Income | Lasets | Lublites | Outride Portions | Agreements | Compare

Common | Instructions Report for yourself (7) at sources of salery, tees, commissions, and other seaned brown greater than \$200, and (3) other non-hestiant fromts such as abidistribes, protes, and gending from \$200, Report for yourself (7) at sources of salery, tees, commissions, and other seaned brown on the status of protein than \$200, Report for your speace (7) at sources of salery, tees, commissions, and other seaned brown on the status of protein than \$200, Report for your speace (7) at sources of salery, tees, commissions, and other seaned brown on the status of the sale of t









Wrap-Up

During Wrap-up, FDM alerts you of any incomplete or missing information.

Review your report flags and correct any errors before submitting your report. A red flag indicates required information is missing and that it must be provided before the report can be submitted. OGE 450 filers cannot submit a report that has red flags. A yellow flag indicates that information is missing but is not required in order to submit your report.

Reviewing Flags

- Click Flags at any time to review a listing of your Red and Yellow flags.
- 12. Click Edit beside any flagged area to adjust that entry.
- **13.** When complete, click **Wrap-Up**. The Report Ready for Submission page is displayed.

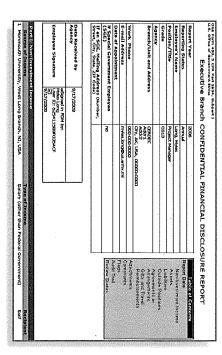
Report Ready for Submission

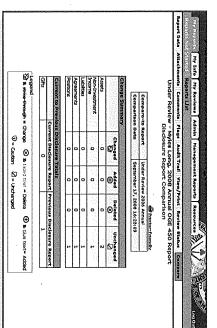
- 14. On the Report Ready for Submission page, select Submit Now to submit your report for review by your Supervisor and 450 Certifier.
- 15. Click Continue.
- Note: You can also opt to select **Submit Later** if you cannot complete your report at this time.

eSigning an OGE 450

- 16. Before eSigning your report, review the certification information regarding the DoD Joint Ethics Regulation requirement to acknowledge the annual post-employment certification and notification about post-Government Employment restrictions.
- 17. Click eSign. Your report has been submitted.
- Note: Click **View this Report** to view and print your report prior to submission.

An e-mail message is automatically sent to your reviewers indicating that your report is awaiting their review.





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- Annual OGE 450 Reports are due 15 February.
- To start a new OGE 450 report click "Add New Report".
 To work on an existing report select a report from the table below.

My OGE 450 Reports

< A	09/23/2008	Under Review	Annual .	2003
d	Last Updated	Review Status	Reporting Status	Year

VIEW/PRINT Your REPORT

At any time, you can view and print your disclosure report.

- ŗ to the appropriate report On the My Reports | Reports List page, select View next
- 'n disclosure report displays in a separate browser window. Click View/Print and then click View/Print again. The

Printing a Report

Select File | Print and then click Print.

COMPARING REPORTS

only available if the Filer pre-populated from a previous report. year's report and this year's on one page. The Compare feature is You can easily compare changes/differences between last

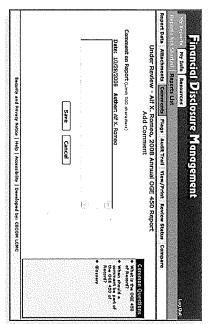
- <u>|-</u> Click Compare
- 'n Review the report changes.
- ω Click Report Data and then Wrap up to eSign your report.

AMENDING A REPORT

Amending a report voids your last digital signature on the OGE 450 report. You must digitally sign the OGE 450 report again once your amendments are complete. FDM notifies all the changed since it was last submitted. this amendment informing them that your OGE 450 report has reviewers who completed an initial review of your report prior to

Up, you must Re-certify your changes and re-sign your report. to Wrap-Up to complete the amendment process. During Wrap-As with drafting or editing your OGE 450 report, you must go

- H On the Reports List Page, click Amend beside the appropriate OGE 450 report.
- Ņ Make the appropriate additions/corrections
- ω When complete, click Wrap-Up
- 4 Submit and eSign your report



ADDING REPORT COMMENTS

Comments can be added to specific line items or to the OGE 450 report itself as substantive or non-substantive comments. Comments (and attachments) can also be added to a report after the report is complete (see next section).

Adding a Line Item Comment

- Click Add a Comment beside the appropriate line item you added. The Add Comment page is displayed
- Type the appropriate information and click Save.

Adding a Report Comment

- Click Comments in the My Reports submenu. The Comments page displays.
- 2. Click Add Report Comment.
- Type the appropriate information and click Save.

Supplemental Report Comments and Attachments

At times, reviewers may request OGE 450 filers to provide additional report information even after the report review is complete (e.g. a disqualification, an ethics agreement.) Consult your ethics counselor for assistance before using this feature.

In FDM, Filers and their assistants can add this supplemental information through report comments and report attachments once the report is complete.

 On the Reports List Page, click View beside the appropriate OGE 450 completed report.

You can add either additional report comments or attachments to your completed report.

Supplemental Report Comments

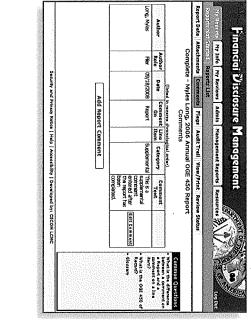
- Click the Comments sub-tab and then click Add Report Comment.
- 3. Type your comment and then click Save.

At this point you can edit the comment you just added or add any additional report comments. Report comments cannot be deleted.

Supplemental Report Attachments

- Click the Attachments sub-tab and then click Add Attachment.
- Select the Attachment Type and then type a brief description of your file in the Notes field.
- Click Browse to locate the file you wish to upload to your financial disclosure report.
- 4. Once you have found the file, click **Upload**.

At this point you can Replace and/or Delete any existing attachments or add a new attachment.



- ethics officials will use the information to determine whether any potential conflicts exist. conflicts of interest between official duties and private financial interests or affiliations. Agency supervisor related to ethics issues to avoid potential conflicts of interest with non-federal entities OGE 450 is for your protection and promotes communication between the Filer and the PURPOSE: The purpose of an OGE 450 is to assist employees and their agencies in avoiding
- employment position, or negotiate employment with businesses or individuals directly related to the performance of your official duties. government capacity. You are prohibited from using inside information for private gain for your government position, you must excuse yourself from activities with them in your yourself or others. Neither you, nor anyone in your household, may own stock, hold an CAUTION. If you have particular business with a non-federal entity that crosses over into
- the public and confidential financial disclosure requirements (§ 402(b)(3) and (5)). Under part of the Ethics in Government Act of 1978, as amended (Ethics Act) and the implementing the Federal Government, mandates the filing of OGE 450 reports under the authority of Title IV 3. AUTHORITY: United States Office of Government Ethics (OGE), an executive branch of conflicts of interest (§ 2638.102(a)(6)). requirements (§ 2638.102(a)(4)), and evaluate the effectiveness of programs designed to prevent 2638, OGE is to monitor compliance with the public and confidential financial disclosure Government Ethics (OGE) is to monitor and investigate individual and agency compliance with regulations at 5 CFR part 2638. Under title IV (5 U.S.C. app.), the Director of the Office of
- DoD employees <u>require</u> them to participate <u>personally and substantially</u> through decision or exercise of significant judgment, and without substantial supervision and review, in taking an 4. CRITERIA: What are the criteria for Filing? Generally when the official responsibilities of substantial economic impact on the interests of any non-Federal entity. non-Federal entity, or other activities in which the final decision or action may have a direct and licenses or other Federally conferred financial or operational benefits, regulating or auditing any official action for contracting or procurement, administering or monitoring grants, subsidies

November 2011: Who should File? In compliance with DoD 5500.07-R, Joint Ethics Regulation (JER) dated 17

- Decision makers and those substantially involved in official actions for contracts or procurement
- conferred financial or operational benefits. Employees who administer or monitor grants, subsidies, licenses or other Federally
- Those involved with regulating or auditing any non-Federal entity
- Persons with a direct and substantial economic impact on the interest of any non-Federal
- installations Commanding officers, heads and deputy heads, executive officers of all Army

- Those designated by design of their position description.
- Those determined by their supervisor. (Within USA Cadet Command, the senior Professor of Military Science (PMS) at each university will file.)
- these positions: Special Government Employees (SGE) as required by their supervisor EXCEPT for
- Physicians & dentists who only provide services to patients
- 0 0 Veterinarians providing only veterinary services.
- 0 Lecturers participating only in educational activities.
- 0 Chaplains performing only religious services.
- 0 Motion picture or TV employees who only narrate or act in DoD productions.
- Reservist on active duty less than 30 consecutive days.
- 0 Members of selection panels for ROTC candidates.
- other authority. Knowing and willful falsification of information may also be subject to criminal 5. WARNING: Non-compliance may result in disciplinary action by the supervisory chain or
- REPORTING PERIOD: The reporting period is for the preceding 12 months and is as
- report from 1 September 2014 to 31 August 2015. notification. New Entrants, the reporting period is the preceding 12 months from your Filing on. For example, you are notified to file an OGE 450 on 1 September 2015. You must
- you are notified to file your annual 2016 report on 1 January 2016. You must report your Be sure to review for necessary changes. on file, it should incorporate into the new year to alleviate re-entering your basic information. on 1 January of each year and may not be started any earlier. If you have a previous OGE 450 financial activity from 1 January to 31 December 2015, the previous year. Annual reports begin Annual Filing, the 12 month reporting period is the last calendar year. For example,
- must complete their reports no later than 15 February of each year. Sooner is preferable and legitimate excuse. highly encouraged as the FDM data base gets overloaded toward the end of the filing season. Valid extensions may be granted through the Ethics Counselor. Procrastination is NOT a DEADLINE: New Entrants have 30 days in which to complete the OGE 450. **Annual Filers**
- MY INFO tab and update your e-mail address, and your telephone number as well. via e-mail directly from FDM. If you are NOT receiving e-mails from FDM, log in, go to the https://www.fdm.army.mil upon notification from the local Ethics Office. You will be notified GETTING STARTED: All OGE 450's will be completed online at The first

the following: course of business is to log into FDM which can present difficulties. Solutions may be one of

- accomplished by your information technical administrator. Your CAC card is <u>not</u> credentialed with Army Knowledge Online (AKO). This can be
- Your AKO username and password is not current, and must be updated in AKO
- part of your **AKO** e-mail address prior to the "@)" Try an initial log in using your AKO username and password. The user name is the first
- . or the next day. Everyone may be trying to log into FDM at once, thus slowing down the system, try later
- FDM populates AKO e-mail addresses of all Army and civilian personnel. If your name is common, you may not actually be in FDM. Contact your ethics office to correct

arrangements, gifts and travel reimbursements. This is typically not as difficult as it may seem OGE 450 Data: Gather your income, assets, liabilities, outside positions, agreements or Keen attention to the below instructions will play a major factor.

- guideline of reportable data and is not inclusive: ALL of the below categories. REPORTABLE DATA: This includes yourself, your spouse, and dependent children for Value or dollar amounts are NOT required. Below is a general
- commissions, fees, retirement benefits, honorarium, dividends, distributions from partnerships etc. List the name of the income source, city and state. This covers non-government employment, rentals, capital gains
- more than \$200.00): (1) REPORT (if the value was more than \$1,000.00 for the year, or income produced
- 401K distributions.
- Capital gains.
- Commissions.
- cash, petroleum, energy, medical companies, Johnson & Johnson, Google, Japan Ford Motor Company, other such specific stocks and bonds. Distribution of sector funds. Sector funds are individual specific funds such as
- Distributions from partnerships.
- Dividends.
- Earned income of spouse from any one source that was more than \$1,000.00.
- Earned income of the Filer from any one source that was more than \$200.00.

- Gambling income more than \$200.00.
- appearance, speech, article, etc. less travel expenses Honorarium. This includes gratuity, compensation, rewards, etc. for an
- Income from rental property.
- Life insurance distributions.
- Non-government employment of self and spouse.
- Retirement benefits (non-government).
- Scholarships.

 Sold assets that produced more than \$200.00.

(2) DO NOT REPORT:

- Dependant child's earned income.
- Federal Government income.
- Military service/retirement benefits
- Social security.
- Veteran's benefits

ġ. Assets

- more than \$200.00): (1) REPORT (if the value was more than \$1,000.00 for the year, or income produced
- 401K from a non-federal entity.
- sponsor, portfolio name. 529 or other pre-paid college tuition funds; include full name of the plan, the
- Collectibles held for investment.
- cash, petroleum, energy, medical companies, Johnson & Johnson, Google, Japan, IRA's only if in sector funds. Sector funds are individual specific funds such as Ford Motor Company, other such specific stocks and bonds.
- Report the company name and the holder; self, spouse, dependant Life insurance, not term, includes Universal Life, Whole Life, Variable Life, etc
- Other sector funds.
- Partnership interests.
- Real estate that produces more than \$200.00. within the reporting period
- Tax shelters.

(2) DO NOT REPORT:

- Bank Certificates of Deposit.
- Checking or savings accounts.
- Diversified mutual funds. These types are in multiple funds and need not be reported.
- Money market accounts.
- Monies from a family member.
- Term life insurance.

c. Liabilities

- (1) REPORT any liabilities or loans over \$10,000.00 from an individual such as a friend, relative, or business associate. Include the person's name, city and state.
- available to the general public: (2) DO NOT REPORT liabilities or loans from a financial institution or business
- Automobile loans.
- Credit card balances.
- Mortgage.
- Student loans.

d. Outside Positions

- (1) REPORT non-government positions whether or not you were compensated:
- Director.
- Educational institution
- Employee.
- Executor or consultant of a corporation.
- General partner
- Non-profit or volunteer organization.
- Officer.
- Partnership.
- Proprietor.
- Representative.
- Trust.
- Trustee.

(2) DO NOT REPORT:

Fraternal.

- Political entity.
- Positions part of your official duties.
- Religious.
- Social.

e. Agreements or Arrangements

(1) REPORT:

- from a former employer. 401K, including continuing participation in an employee pension or benefit plan
- A leave of absence
- Future employment including date you accepted the employment offer
- Continuation of payment by a former employer.
- Severance payments.
- DO NOT REPORT agreements or arrangements related to Federal Government.

f. Gifts and Travel Reimbursements.

transportation and food (1) REPORT: Gifts totaling more than \$375.00 from a single source including lodging,

(2) DO NOT REPORT:

- Gifts from relatives.
- Reimbursements for official government travel.
- Bequests and other forms of inheritance.
- such as food, lodging, entertainment. Gifts of hospitality for non-business at the donor's residence or personal premises
- you. Gifts to your spouse or dependent children independent from their relationship to

FAQs/ or simply Google "OGE 450 FAQ". Disclosure/Confidential-Financial-Disclosure-450/OGE-Form-450-FAQs/OGE-Form-450-For Frequently Asked Questions (FAQ), go to http://www.oge.gov/Financial-

it's better to provide too much information than too little. your ethics counselor or point of contact for specific questions and answers. 10. UNIQUE CIRCUMSTANCES: Not every scenario is answerable in this forum. Contact Do not list dollar amounts or value. A rule of thumb is;

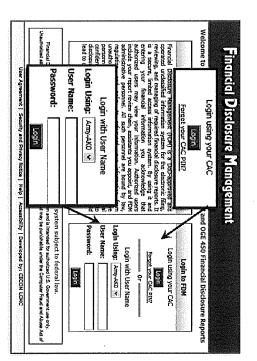
- supervisor will e-sign as the reviewer, prior to legal review by an official ethics counselor. designated supervisor in FDM does not necessarily imply your actual supervisor, but a reviewer FDM and e-signed in order to be compliant with the filing requirement. Your designated A group of personnel may have the same "supervisor" in a particular organization for simplicity SUBMITTING YOUR REPORT: All OGE 450's must be completed electronically in
- official for input into FDM, otherwise, you will not be compliant. training can be web based, classroom instruction, or written materials provided by ethics Army. It is required each calendar year and should be completed by 1 December. Methods of ANNUAL ETHICS TRAINING is mandated by OGE and reinforced by the Secretary of the You, the Filer, must provide proof of training to your designated POC or ethics
- Federal Regulations, in 5 C.F.R. Chapter XVI. Chapter XVI is divided into two subchapters: to an individual's report. OGE publishes its own chapter of regulations each year in the Code of Statement, 5 U.S.C., §552a, lists other limited circumstances and persons who may have access counselor will review to ensure there is not a conflict of interest between personal interests and FDM, they are labeled as the supervisor. Upon completion of the supervisor review, an ethics Filers will have their OGE 450 reviewed by a designated reviewer in their chain of command, in 13. PRIVACY: The OGE 450 is a confidential form, and thus not releasable to the public. All professionalism. The release of information typically stops there, however, The Privacy Act
- The regulations in subchapter A (parts 2600 2610) concern the internal organization and operation of OGE
- The regulations in subchapter B (parts 2634 2641) are broader in scope and are central certain civil and criminal conflict of interest laws, implement statutory provisions relating other regulations in Subchapter B contain guidance concerning the interpretation of to the executive branch ethics program. In particular, the OGE regulation at 5 C.F.R. part executive branch ethics program. to financial disclosure, and describe responsibilities relating to the administration of the 2635 contains standards that govern the conduct of all executive branch employees. The

KEY FEATURES - FILERS



various processes contained within FDM Management (FDM) system. Separate Quick Reference Cards will give you a more in depth, step-by-step look at the This guide will give you a brief overview of some of the main features and components of the Financial Disclosure

The functions of the FDM System are personalized to your FDM role giving you instant access to relevant data. All FDM functions are organized into separate tab categories. FDM has two main tabs for Filers, My Reports and My Info.



Accessing FDM

Before you can log in to the Financial Disclosure Management system (FDM), you must be a registered FDM user. Simply type in https://www.fdm.army.mil into your browser address bar and then click the **Login** button on the left side of the page.

Using Your CAC

If you have a CAC, click Login (Login Using your CAC) on the FDM Login page. $\label{eq:continuous} % \begin{tabular}{ll} \end{tabular} % \begin{tabular}{ll} \end{tabular}$

Using Your User Name and Password

You can also access FDM by typing in your User Name and Password*. Be sure to select your appropriate authenticating source/user directory from the Login Using drop-down.

Note: *Your User Name and Password are typically your network login information.

My REPORTS

My Reports is the main work area for filers where they can create and manage their disclosure reports.

Reports Not Started)

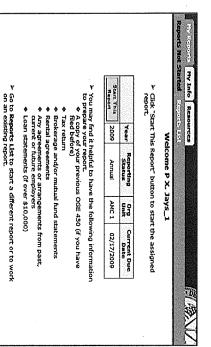
OGE 450 and 278 Filers and Filer Assistants are directed to Reports Not Started tab when they have been assigned to create a disclosure report in FDM. This page is the where Filers begin creating financial disclosure reports. Once a Filer or Filer Assistant starts an assigned report, the report will move from the Reports Not Started page to the Filer's Reports List page.

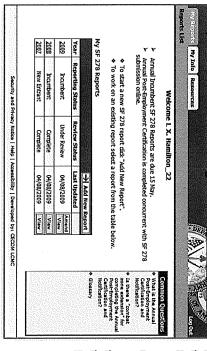
Reports List

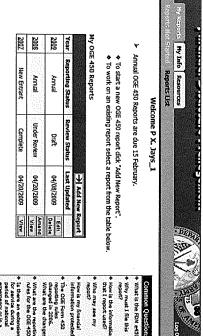
The Reports List displays any reports you already have in FDM. OGE 278 and OGE 450 Filers and Filer Assistants can opt to create a different report than the one assigned, by clicking Reports List tab.

The Reports List is where any filer would go to amend a report that is under review.

Filer Assistant's begin creating financial disclosure reports from the Assist Filers page. If a Filer Assistant has more than one filer, they can select the Filer through a drop-down list on the page.







How is my financial information probability The OGE Ferm 450 reporting rules changed in 2006. What are the reporting rules for the OGE 450? How is the information that I report used? Who may see my report?

DAEO	Senior Legal Counsel Ethics Counselor Ethics Counselor Assistant	Supervisor SLC Ethics Counselor Ethics Counselor Assistant	Supervisor	Reviewer Role	Review Chain Audit Trail	Completed:	Submitted for	Filer eSign ar Amended:	Filer Started:	Assigned:	Sentor Le	Con	Data Atta	Filars Review	My Info
Adam X Baum	Gladys X Frydey Jays, 17. P. X. Siedd. Bob X. Siedd. Bob X.	Gladys X Frydey Jays 17. P.X. Sledd, Bob X. Sledd, Bob X.	Winnie X Bago	Currently Assigned Reviewer	Audit Trail	04/0	Submitted for Certification: 04/08/2009	Filer eSign and Submitted: 04/08/2009 Amended:	04/0	Yes	Senior Legal Counsel	Complete - L X. Hamilton_22, 2008 Incumbent SF 278 Report Review Status	Attachments Comments Flags	Review Reports Hanage	AV REVIEWS Admin E
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Report Data

Report Data is the main area used for preparing a financial disclosure report. Filers and their Assistants can access Report Data by clicking **View, Edit** or **Amend** beside a financial disclosure report on the Reports List page.

Other useful Report pages are:

		F Transpoor	versus and and	***************************************						
Compare		Raview Status	View/Print	Audit Trail		Flags		Comments		Attachments
In FDM, you can easily compare changes/ differences between a prior report and the current report. This feature is only available if you pre-populated from a previous report.	of a financial disclosure report, which includes signing status, a list of assigned reviewers and their role as well as their review and signature date.	report, flags, comments, job description. Review Status page shows the progress	Within View/Print, a Filer or Reviewer can view and print a financial disclosure	The Audit Trail tracks and time stamps all changes made to the report.	review any financial disclosure report flags, to note any missing or invalid information.	Within Flags, Filers and Reviewers can	report has a draft status. Comments can also be added to a report after the report is complete.	Within Comments, Filers and Reviewers can record their comments on a financial disclosure report. Filers can edit	attachments. Attachments can also be added to a report after the report is complete.	Within Attachments, a Filer can add, replace or delete attachments and Reviewers can view any associated

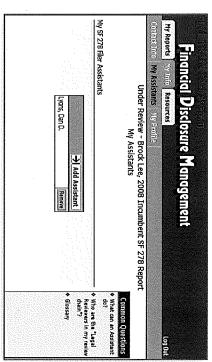
Key Features - Filers

My Info

The My Info tab provides you access to manage your contact preferences, specify Assistants and view your FDM roles and related org units.

Contact Information

The Contact Information page contains your personal contact information, such as e-mail address, phone and mailing address. Information on this page can be updated and saved at any time. This page displays the first time a FDM user logs into the system for editing and/or verification.



My Assistants

Use the My Assistants page to appoint an assistant to help with the report creation process. Filer Assistants can only create a draft report for the Filer's they are assist. They cannot eSign or amend a report for a filer in FDM.

My Profile

The My Profile page displays your FDM roles, Org Unit relationships, and Assistants, if any. Displays information about your FDM role and identifies which org units you have access to by FDM role.

Note: For more information about editing your logins in FDM, please see **QRC Login Credentials**.

Financial Disclosure Management My Reports of the Resources My Profile My Profile My Roles 4 278 Filer As 278 Filer, I have . . . Lyons, Dan D. as SF278 Filer Assistant Security and Privacy holds | Halp | Accessibility | Developed by: CECOM LCMC Security and Privacy holds | Halp | Accessibility | Developed by: CECOM LCMC



FDM Annual Confidential OGE 450 Filer Worksheet

Worksheet Instructions:

This spreadsheet is for agencies that are doing their initial FDM setup and will help distinguish Annual Filers from New Entrant Filers.

Sample Filer and organization information is provided below.

Sort this list by Supervisor's e-mail to group your filers together when copy/pasting into FDM.

Reference page 9 for setting up org units. (Click here.)

Salar and the sa	Reference page 14 of t	he FDM POC Basic (<u>user Gu</u>	<u>iide for registering Filers in FDM,</u>		<u> 18 martin 18 m</u>	<u>, dan mang pagatan naka sa Sabagi (sa Sa</u>	
Filer's e-mail Address	Filer's Last Name	Filer's First Name	MI	Organization Name	Filer's Reviewer/Supervisor	Supervisor's title	Supervisor's e-mail	450 Certifier
Enter the agency specific e-mail address, e.g., suffix@abc.mil or suffix@abc.gov.				The Org Unit Name must be unique and is limited to 20 alphanumeric characters. The Org Unit name should accurately reflect the Org Unit of Filers you supervise. We recommend using the reviewing supervisor's position name here. For example, John Jones works for Jane Doe who is Chief, DRM. For organization name, use "DRM." Do the same for all other report filers that Jane Doe will review. For subordinate branches in DRM use the position title of the branch chief to group the filers that branch chief to group the filers that branch chief will review.	Name of the person who is responsible for completing a technical review of the Filer's financial disclosure report.	Title of supervisor's position. The Supervisor's position/fitle is very important as it will assist in naming subordinate Org Units. EVERY Supervisor will have a separate Org Unit for their Filers.	E-mail address of Supervisor of the org unit. Enter the agency specific e-mail address, e.g., suffix@abc.mil or suffix@abc.gov.	Name of the Ethics Offi responsible for reviewir financial disclosure rep
Sample Filer and Org Unit Inforr	nation							· · · · · · · · · · · · · · · · · · ·
Samson.A.Knight@us.army.mil	Knight	Samson	Α	OGC	Michael Raffone	Director	Michael.Raffone@us.army.mil	E. Pickney
Barbie.Dahl@us.army.mil	Dahl	Barbie						
Manny.Kin@us.army.mil	Kin	Manny		North East Region	Forrest Ranger	Chief	Forrest.Ranger@us.army.mil	
Eileen.Lefte@us.army.mil	Lefte	Eileen						
Jim.Shoe@us.army.mil	Shoe	James						
Patty.O.Furniture@us.army.mil	Furniture	Patricia	0	NE Region 1	Gladys Frydey	Branch Chief	Gladys.Frydey@us.army.mil	
Anne.T.Social@us.army.mil	Social	Anne	Т					
Armand.Hammer@us.army.mil	Hammer	Armand						
Marty.Graw@us.army.mil	Graw	Martin						
(Type Filer's e-mail address here.)	(Type Filer's First Name here.)	(Type Filer's Last Name here.)		(Type Filer's Org Unit Name here.)	(Type Filer's Supervisor Reviewer Name here.)	(Type Supervisor's Title here.)	(Type Supervisor e-mail address here.)	here.)
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Filer's e-mail Address	Filer's Last	Filer's First	мі	Organization Name	Filer's	Supervisor's title	Supervisor's e-mail	450 Certifier
	Name	Name	1742	Organization Name	Reviewer/Supervisor	Supervisor's title	Supervisor s e man	450 001 01101



FDM New Entrant Confidential OGE 450 Filer Worksheet

Worksheet Instructions:

Use this worksheet to distinguish between your New Entrant filers and Annual filers.

Once an agency/org unit exists in FDM, add New Entrant filers as they arrive so they can be assigned a New Entrant report and notified to use FDM for tracking purposes.

New Entrant Filers are new employees who will file for the first time or current employees with new duties that require filing an OGE 450 for the first time.

Reference page 9 in the FDM POC Basic User Gide for setting up org units. (Click here.)

Reference page 14 in the FDM POC Basic User Guide for registering Filers in FDM. (Click here.)

	Reference page 14 in th	ne FDM POC Basic Use	er Guid	<u>de tor registering Filers in FDM. (Clic</u>	ck nere.j			
Filer's e-mail Address		Filer's First			Filer's			
	Filer's Last Name	Name	MI	Organization Name	Reviewer/Supervisor	Supervisor's title	Supervisor's e-mail	450 Certifier's Na
Enter the agency specific e-mail address, e.g., suffix@abc.mil or suffix@abc.gov.				The Org Unit Name must be unique and is limited to 20 alphanumeric characters. The Org	financial disclosure report.	Title of supervisor's position. The Supervisor's position/title is very important, as it will assist in naming subordinate Org Units. EVERY Supervisor will have a separate Org Unit for their Filers.	E-mail address of Supervisor of the org unit. Enter the agency specific e-mail address, e.g., suffix@abc.mil or suffix@abc.gov.	Name of the Ethics Official who is res for reviewing the Filer's financial disc report.
Sample Filer and Org Unit Infor	mation						1	
Samson.A.Knight@us.army.mil	Knight	Samson	Α	OGC	Michael Raffone	Director	Michael.Raffone@us.army.mil	E. Pickney
Barbie, Dahl@us, army, mil	Dahl	Barbie						
Manny.Kin@us.army.mil	Kin	Manny		North East Region	Forrest Ranger	Chief	Forrest.Ranger@us.army.mil	
Eileen.Lefte@us.army.mil	Lefte	Eileen		-				
Jim.Shoe@us.army.mil	Shoe	James						
Patty.O.Furniture@us.army.mil	Furniture	Patricia	0	NE Region 1	Gladys Frydey	Branch Chief	Gladys.Frydey@us.army.mil	
Anne.T.Social@us.army.mil	Social	Anne	Т					
Armand, Hammer@us.army.mil	Hammer	Armand	1					
Marty.Graw@us.army.mil	Graw	Martin						
(Type Filer's e-mail address here.)	(Type Filer's First Name here.)	(Type Filer's Last Name here.)		(Type Filer's Org Unit Name here.)	(Type Filer's Supervisor Reviewer Name here.)	(Type Supervisor's Title here.)	(Type Supervisor e-mail address here.)	(Type 450 Certifier's Name
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